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November 30, 2007

BY FACSIMILE

The Honorable Richard J. Sullivan
United States District Court
Southern District of New York
500 Pearl Street
Room 615
New York, New York 10007

MEMO ENDORSED

Re: The Procter & Gamble Company v. Ultreo, Inc., Case No. 07 Civ. 8379 (RJS)

Dear Judge Sullivan:

We are counsel to The Procter & Gamble Company ("P&G") in the above-referenced case. We write in connection with an urgent discovery matter and appreciate the Court's willingness to hear this issue on short notice. As you know, the parties in this case are engaged in expedited discovery proceedings in anticipation of a preliminary injunction hearing before the Court on December 19-20.

At a deposition of a P&G representative on November 27, 2007, counsel for Ultreo requested the production of a settlement agreement between The Gillette Company (the then-maker of Oral-B toothbrushes) and Philips Oral Healthcare, Inc. ("Philips"). During that deposition, the P&G witness made reference to the settlement agreement, and on the following day, another P&G employee referred to the agreement during his deposition. That settlement agreement resolved a litigation between the parties involving advertising claims very similar to the claims currently being used by Ultreo, which are the subject of P&G's preliminary injunction motion. The Gillette-Philips settlement agreement is confidential and requires P&G (as the successor to Gillette) to provide Philips with prompt notice of any request for the production of the agreement. Following the conclusion of the deposition on November 27, 2007, counsel for P&G informed Philips that a request had been made for the settlement agreement and that P&G intended to produce a copy of the settlement agreement to Ultreo. Philips has objected to the production of the settlement agreement.

We do not believe that Philips has any right to object to the disclosure of the agreement, but since counsel for Philips has threatened legal action against P&G based on the production of this document in this action, we would like to discuss this matter with the Court.

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All counsel, including counsel for Philips, are available to discuss this matter at the Court's convenience on Monday, December 3, 2007. Counsel for P&G and Ultreo will be attending a deposition in this case on Monday, December 3, 2007 and would request that the matter be heard by conference call.

Respectfully submitted,



LAURA W. SAWYER
Counsel for The Procter & Gamble Company

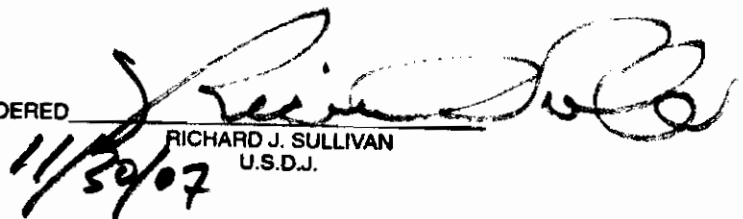
cc: Anthony DiSarro, Counsel for Ultreo, Inc.
(by electronic mail)

Michael Steinberg, Counsel for Philips Oral HealthCare, Inc.
(by electronic mail)

*Conference call scheduled for
December 3, 2007 @ 2:15pm E.S.T.
Once all the parties are on the
line, they can call chambers at
212-805-0264.*

SO ORDERED

Dated:


11/30/07

RICHARD J. SULLIVAN
U.S.D.J.